

2007

Christopher M. Sullivan v. Utah Board of Oil, Gas and Mining, Kerr-McGhee Oil and Gas Onshore LP : Unknown

Utah Court of Appeals

Follow this and additional works at: https://digitalcommons.law.byu.edu/byu_ca3



Part of the [Law Commons](#)

Original Brief Submitted to the Utah Court of Appeals; digitized by the Howard W. Hunter Law Library, J. Reuben Clark Law School, Brigham Young University, Provo, Utah; machine-generated OCR, may contain errors.

Michael S. Johnson; Stephen Schwendiman; Assistant Attorneys General; Criag D. Galli; Cecilia M. Romero; Holland & Hart.

Christopher M. Sullivan; Pro Se.

Recommended Citation

Legal Brief, *Sullivan v. Utah Board of Oil, Gas & Mining*, No. 20070410 (Utah Court of Appeals, 2007).
https://digitalcommons.law.byu.edu/byu_ca3/260

This Legal Brief is brought to you for free and open access by BYU Law Digital Commons. It has been accepted for inclusion in Utah Court of Appeals Briefs by an authorized administrator of BYU Law Digital Commons. Policies regarding these Utah briefs are available at http://digitalcommons.law.byu.edu/utah_court_briefs/policies.html. Please contact the Repository Manager at hunterlawlibrary@byu.edu with questions or feedback.

CHRISTOPHER M. SULLIVAN

OIL AND GAS CONSULTANT - ATTORNEY AT LAW

FILED
UTAH APPELLATE COURTS
JAN 10 2008

January 7, 2008

UTAH SUPREME COURT
Attn: Appellate Clerk
450 South State Street, Fifth Floor
Salt Lake City, UT 84114

Via Fax (801) 578-3999
2 pages total, with
original via 1st class mail

Re: Petition for Review – Appellate Case No. 20070410
Christopher M. Sullivan vs. Utah Board of Oil, Gas and Mining, and
Kerr-McGee Oil & Gas Onshore, LP, now Anadarko Petroleum Corporation

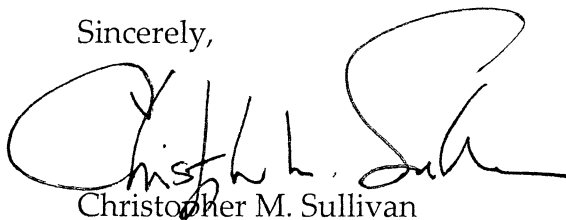
Dear Sir or Madame,

This letter confirms that the Petitioner will not file a Reply Brief in this appeal. Ongoing discovery in the civil action pending in the Eighth Judicial District is expected to shortly resolve many of the underlying factual disputes in this matter. The trial is estimated to commence in the next three to four months and will demonstrate, *inter alia*, why an administrative investigation over a year ago would have been the much preferred means for Petitioner to resolve this royalty dispute.

Petitioner respectfully requests an opportunity for oral argument to enable this Court to better understand the issues presented. Petitioner would be honored to participate and present arguments supporting his brief, and reply to the factual and legal positions set forth in Respondents' briefs.

This appeal illustrates the challenges faced by Utah royalty owners seeking remedial relief under Utah's royalty statutes, and presents this Court a unique opportunity to clarify these important laws.

Sincerely,



Christopher M. Sullivan

CERTIFICATE OF SERVICE

I hereby certify that on January 7th, 2008, a copy of the foregoing letter to the Utah Supreme Court was served upon the parties listed below, via first class mail, and addressed to the following:

Craig D. Galli
Cecilia M. Romero
HOLLAND AND HART, LLP
60 E. South Temple, Suite 2000
Salt Lake City, UT 84111-1031

Attorneys for Kerr-McGee Oil & Gas
Onshore, LP

Michael S. Johnson
Stephen Schwendiman
Assistant Attorneys General
Utah Board of Oil, Gas and Mining
1594 West North Temple, Suite 300
Salt Lake City, UT 84116

And a true and correct copy was also deposited in the United States mail to the agency listed below:

Board of Oil, Gas and Mining
1594 West North Temple, Suite 300
Salt Lake City, UT 84116

By: 